

## REMARKS

Claims 1 through 21 and 23 through 27 are in the application, with Claims 1, 10, 15, 17, 21, 23, and 24 having been amended, and claim 22 having been cancelled. Claims 1, 10, 15, 17, 20, and 24 are the independent claims herein. No new matter has been added. Reconsideration and further examination are respectfully requested.

### Claim Rejections

Claims 1-4, 6, 10-13, 15 and 24 are rejected under 35 U.S.C. 102(b) as being anticipated by U.S. Patent No. 5,760,941 ("Young"). Claim 5, 7-9, 14, 16-23 and 25-27 are rejected under 35 U.S.C. 103(a) as being unpatentable over Young in view of U.S. Patent No. 5,793,031 ("Tani"). Reconsideration and withdrawal of the rejections are respectfully requested.

Claims 1, 10, 15, 17, and 24

Amended independent claim 1 describes an apparatus comprising a hinge, a multi-level symbol encoder, an optical link, and a multi-level symbol decoder. The multi-level symbol encoder is to receive display data and to generate multi-level symbols. The optical link is to be provided through the hinge and coupled to the symbol encoder. The multi-level symbol decoder coupled to the optical link is to receive the symbols and to re-create the display data.

The art of record is not seen to disclose the above-mentioned features of amended independent claim 1. In particular, the art of record is not seen to disclose or to suggest an optical link provided through a hinge and coupled to a multi-level symbol encoder and a multi-level symbol decoder.

Young describes a system and method for performing optical code division multiple access (CDMA) using bipolar codes. The system described in young includes an encoder 100, a decoder 130, and fiber optic cable 82. However, nowhere does Young disclose that the optical cable is provided through a hinge.

The remaining art of record has been reviewed and is not seen to remedy the above-mentioned deficiency in Young. Accordingly, nowhere can Young be seen to disclose or to suggest an optical link provided through a hinge and coupled to a multi-level symbol encoder and a multi-level symbol decoder.

In view of the foregoing, amended independent claim 1 and its dependent claims are believed to be in condition for allowance.

Claims 10, 15, 17 and 24 describe a method, an article, an apparatus, and an apparatus, respectively, in which an optical link is provided through a hinge. In view of the foregoing, amended independent claims 17 and 24 and their related dependent claims are believed to be in condition for allowance.

#### Claim 20

Independent claim 20 describes a mobile computer comprising a first portion and a second portion. The first portion houses a processing device. The second portion houses a display device. Moreover, an optical link is to provide data from the processing device to the display device.

The art of record is not seen to disclose or suggest the above-mentioned features of independent claim 20. In particular, the art of record is not seen to disclose or suggest an optical link to provide data from a processing device to a display device.

The Office Action states that it would have been obvious to include the display device 20 of Tani in the apparatus of Young. Applicant respectfully disagrees.

To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success and third, the prior art references when combined must teach or suggest all the claim limitations.

Looking at the third criteria, Tani, at column 7, lines 43 – 47, and as shown in FIG. 3, discloses a display 20 coupled to CPU 15 to display decoded information. However, nowhere does Tani disclose or suggest that the CPU 15 is coupled to the display 20 by an optical link. Moreover, as stated in Tani at Column 1, lines 50 – 65, an image sensor such as the CCD 43 image sensor converts the applied light into an image signal that is converted by a signal processor into a digital signal. However, Tani states that the CCD 43 is electronically connected to the signal processor. Accordingly, Tani does not disclose an optical connection between the CPU 15 and the display 20 but an electronic connection between the CPU 15 and the display 20.

Therefore, the combination of Tani and Young, taken in any permissible combination, fails to disclose or suggest an optical link to provide data from a processing device to a display device.

In view of the foregoing, independent claim 20 and its related dependent claims is believed to be in condition for allowance.

## CONCLUSION

The outstanding Office Action presents a number of characterizations regarding the applied references, some of which are not directly addressed by this response. Applicant does not necessarily agree with the characterizations and reserve the right to further discuss those characterizations.

For at least the reasons given above, it is submitted that the entire application is in condition for allowance and such action is respectfully requested at the Examiner's earliest convenience. Alternatively, if there remains any question regarding the present application or any of the cited references, or if the Examiner has any further suggestions for expediting allowance of the present application, the Examiner is kindly invited to contact the undersigned via telephone at (203) 972-4982.

Respectfully submitted,

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Date



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